

The Food Allergy & Anaphylaxis Network (FAAN) welcomes this opportunity to provide public comments on FDA's 2005 Food Safety Survey (FSS). Our understanding is that the 2005 FSS will contain the same questions pertaining to food allergy that were found on the 2003 FSS. These questions helped CFSAN better understand the prevalence, the symptoms, and the treatment of this disease, and provided valuable data for the Healthy People 2010 initiative.

In preparation for the 2005 FSS, FAAN will provide, via this public comment, current information to support consumer education programs and regulatory development.

## **Introduction**

Food allergy is an emerging food safety and public health issue in the US, affecting more than 11 million Americans. We now estimate that approximately 11.4 million Americans, or 4% of the population, have a food allergy. This represents a significant increase from estimates just 10 years ago, when scientists believed that food allergy affected less than 1% of the population. These individuals are at risk for anaphylaxis, a severe, potentially life-threatening allergic reaction which results in 30,000 Emergency Department visits and 150-200 deaths each year in the US.

Currently, there is no cure for food allergy. Strict avoidance of the particular food is the only way to prevent a reaction. However, public policy (i.e., regulations, consumer education programs) to accommodate this growing segment of the population is lagging behind.

As a result, it is imperative that FDA, along with other federal agencies, support educational and regulatory efforts aimed at improving the lives of all those affected by the disease. One such effort is the 2005 FSS.

Food allergy is an especially serious issue facing children and teens. In a nationwide survey, 44% of elementary school nurses reported an increase in children with food allergies in their schools over the last 5 years; only 2% reported a decrease. More than one-third of the school nurses had 10 or more students with food allergies.<sup>1</sup>

## **Accurate food allergy data is lacking**

Accurate and reliable data on food allergy and anaphylaxis is lacking, and it is generally believed that the limited data currently available represents an under-reporting of food allergy-related reactions and deaths.

There are various reasons that may explain this under-reporting. First, medical practitioners may be utilizing incorrect ICD codes. A study in Denmark found that

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<sup>1</sup> Christopher Weiss, Anne Munoz-Furlong, Terence J. Furlong, and Julie Arbit. Impact of Food Allergies on School Nursing Practice. *Journal of School Nursing* 2004;20:268-78.

40% of anaphylaxis patients had been given an incorrect ICD-9 code.<sup>2</sup> Second, health practitioners may be unfamiliar with the new ICD-10 classification codes. 1999 was the first year ICD-10 was used; reports from 1999 and 2000 show a significantly lower number of reports of deaths from anaphylaxis caused by food allergies than expected. Hopefully, improvements in health practitioner training in the use of appropriate ICD codes will be made.

## **Conclusion**

Clearly, data collected by the 2005 FSS will be a significant contribution to the food allergy community.

The FSS will build on the preliminary data obtained in the 2001 FSS, and will be a vital contribution not only to the general knowledge base of food allergy in the U.S., but also to Healthy People 2010 objectives 10.4a (to reduce deaths from anaphylaxis caused by food allergies) and 10.4b (to reduce severe allergic reactions to food among adults with a food allergy diagnosis).

FAAN looks forward to the completion of the 2005 FSS, and anticipates its findings.

*FAAN is a nonprofit organization with more than 27,000 members, most of whom are the parents of children with life-threatening food allergies. FAAN's mission is to raise public awareness, provide advocacy and education, and to advance research on behalf of all those affected by food allergies and anaphylaxis.*

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<sup>2</sup> HT Sorenson, B Nielsen and J.O. Nielsen. Anaphylactic shock occurring outside hospitals. *Allergy* 1989;44:288-290